

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

OCT - 9 1996

JAMES R. LARSEN, CLERK
DEPUTY

UNITED STATES OF AMERICA

Plaintiff,

vs.

JAY MERRELL, aka JAY,

Defendant.

MOTION FOR DETENTION
HEARING

No. 96-0379A-01

The United States moves for pretrial detention of
defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a
detention order because case involves (check all that
apply):

☒ Crime of violence (18 U.S.C. § 3156)

☒ Maximum sentence life imprisonment or death

☐ 10+ year drug offense

☐ Felony, with two prior convictions in above
categories

☒ Serious risk defendant will flee

☒ Serious risk obstruction of justice

2. Reason For Detention. The court should detain
defendant because there are no conditions of release
which will reasonably assure (check one or both):

☒ Defendant's appearance as required

☒ Safety of any other person and the community

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- 1 3. Rebuttable Presumption. The United States will
2 invoke the rebuttable presumption against defendant
3 under Section 3142(e). (If yes) The presumption
4 applies because (check one or both):
5 X Probable cause to believe defendant committed 10+
6 year drug offense or firearms offense, 18 U.S.C.
7 § 924(c)
8 Previous conviction for "eligible" offense
9 committed while on pretrial bond
10 4. Time For Detention Hearing. The United States
11 requests the court conduct the detention hearing,
12 At first appearance
13 X After continuance of 3 days (not more than 3).
14 5. Other Matters.

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16 DATED this 9th day of October, 1996.

17 JAMES P. CONNELLY
18 United States Attorney

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20 THOMAS O. RICE
21 Assistant United States Attorney
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